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ENVIRONMENTAL
TOXICITY AGENCY

AUG 27 1998

conference call notes

MONTANA OFFICE


1071107 - R8 SDMS

Conferees:

John Carter, Walter Nowotny; The Doe Run Company
John Hunt, Tim Skoglund; Barr Engineering
Judy Reese; Montana DEQ
John Goering, Greg Vandenberg; MSU Reclamation Research Unit
Rosemary Rowe; Montana EPA
Bob Kirkpatrick, Robin Strathy; Forest Service
Steve Silverman; Office of the General Counsel

The group reviewed the comments to the Work Plan and Sampling and Analysis Plan supplied in the 8/7/98 Forest Service letter to Doe Run. Several simply required clarification, that could be accomplished during the conversation; others required additions or revisions to text. Following the conversation, it was agreed that Barr would rewrite the FSAP and Work Plan and resubmit. They would also explain other agreements resulting from the conference call in a cover letter to the revised Work Plan.

Barr was working toward being able to start field sampling around the 15th of September.

The following are just some of the topics discussed for the Work Plan:

Section 2.0: The specific extent of the "area". Concern was voiced that the areal extent could become open-ended; at the same time, agencies wanted assurance that actions would cover tailings that have migrated from the impoundment and may now reside along the Dry Fork Belt Creek or Galena Creek.

Section 6.0: It was requested that removal action objectives be stated as per Forest Service correspondence to Doe Run dated 5/29/98. Concern was expressed with being able to demonstrate that actions will measurably reduce impacts to surface water quality (objective #2) and whether that objective was intended to mean zero impact. It was not. Barr will develop possible language to refine this objective.

Appendix C - Proposed ARARs: It was suggested that it be made clear that ARARs are draft at this point, and will be refined once a removal alternative is selected. Legal counsel for Doe Run and DEQ agreed to discuss and resolve other ARAR issues identified by the State. Beville amendment issues may not be pressing at this point, but could depend on the final removal action alternative selected.

Some of the comments on the Field Sampling and Analysis Plan included:

Section 4.3: It was agreed that tailings that have migrated onto Gwen McBride's property are likely to be similar in characteristics to those in the lower impoundment and specific sampling is not necessary there. Soil samples will be collected at the streamside tailings location on Dry Fork Belt Creek.

Section 4.4: It was requested that tailings be sampled above and below the oxidized/reduced interface. MSU had information from testing they had done on the tails that showed oxidation from about 4-feet and below in the upper tails. They will provide Barr with the results of their investigation.

It was requested that SMP buffer lime requirements be analyzed. Barr said detailed lime requirements may need to be determined during removal actions and identified by sampling at that time.

Table 2 - Sampling Network Summary: Several other parameters for testing were requested: SMP and total sulfur from tailings, and other parameters for water. It was agreed that silver could be dropped as it was not present to any great extent in previous samplings.

Following the main conference call, a discussion took place with Barr Engineering's hydrogeologist and MSU consultants on the merits of installing lysimeters in the tails to characterize the contaminants from the tailings, prior to possible dilution by regional groundwater. Barr's hydrogeologist was comfortable with the information lysimeters could supply. Barr will look into the price of purchasing and installing lysimeters and report this information to Doe Run.

Concern was expressed that requiring another round of sampling in the spring could impact timeframes for completion of the EE/CA. It was agreed that the EE/CA process should continue, but that spring sampling should also be done and may, or may not, supply additional data. Spring sampling should be included in the Work Plan.

Notes taken by: Robin Strathy; Forest Service On Scene Coordinator

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